

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

RYAN NERVEN NISBETT

(Enter above the full name of the plaintiff
or plaintiffs in this action.)

RECEIVED

MAY 17 2023

Wendy R Oliver, Clerk
U.S. District Court
W.D. OF TN, Memphis

vs.

Sheriff Floyd Bonner Jr.
ETC.

(Enter above the full name of the defendant
or defendants in this action.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS UNDER 42 U.S.C., §1983

I. Previous Lawsuits

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? Yes () No (☒)
- B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit

Plaintiffs:

N/A

Defendants:

N/A

2. Court (if federal court, name the district; if state court, name the county):

N/A

N/A

3. Docket Number:

4. Name of judge to whom case was assigned:

N/A

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

N/A

N/A

6. Approximate date of filing lawsuit:

N/A

7. Approximate date of disposition:

DEFENDANTS IN THIS ACTION

Shelby County Commissioner

Chief Kirk Fields

201 Poplar Shelby County Jail

Lieutenant Echols

Sergeant Brown

Sergeant Morning

Officer Boyland

Officer Gray DRT

Officer Baker DRT

Officer Wilkins DRT

Officer Hilson DRT

Officer Underwood DRT

Sergeant Buford

Officer Hinnings

Officer Harris

Officer Jones

Officer Jones

Sergeant Austin

Officer Smith

201 Medical Staff

Nurse Austin

Sergeant Echols (MAN)

Nurse Bright

II. Place of Present Confinement: 201 Poplar Shelby County Jail

A. Is there a prisoner grievance procedure in the institution?

Yes ☒ No ☐

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes ☒ No ☐

C. If your answer is Yes:

1. What steps did you take? WROTE GRIEVANCE

2. What was the result? I NEVER RECEIVED A RESPONSE OR RESULTS

D. If your answer is No, explain why not: N/A

III. Parties

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff RYAN Nisbett

Address 201 Poplar Ave., Memphis, Tennessee 38103

(In item B below, place the full name of the defendant in the first blank, his official position in the second blank, and his and his place of employment in the third blank. Use Item C for the names, positions, and places of employment of an additional defendants.)

B. Defendant Sheriff Floyd Bonner Jr. is employed as Sheriff at 201 Poplar Ave., Memphis, Tennessee 38103

C. Additional Defendants: Shelby County Commissioner, Chief Kirk Fields, 201 Poplar Shelby County Jail, Officers: Boyland, Hinnings, Harris, Jones, Jones Smith,

IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.

1) ON MARCH 25th (6AM - 2PM SHIFT) DURING "Pill Call" NURSE BRIGHT AND OFFICER BOYLAND WAS PASSING OUT MEDICATION AND SERGEANT BROWN WAS OPENING AND CLOSING CELLS. ON MARCH 25th 2023 6AM - 2PM WHEN NURSE BRIGHT AND OFFICER BOYLAND CAME TO MY CELL 4-S-17 TO GIVE ME MY MEDS SERGEANT BROWN CRACKED MY CELL JUST ENOUGH TO STICK MY HAND THROUGH (MAYBE 4 INCHES) BUT THIS TIME SHE DIDN'T LOOK TO MAKE SURE MY HAND WAS BACK IN MY CELL SO SHE "SERGEANT BROWN" CLOSED MY CELL ON MY ARM.

CONTINUE OF PAGE 2 III. PARTIES C. ADDITIONAL DEFENDANTS

LIEUTENANTS: Echols, SERGENTS: Buford, Austin, Echols, Brown,
MORNING, DRT OFFICERS: GRAY, BAKER, WILKINS, UNDERWOOD,
HILSON, 201 MEDICAL STAFF, NURSE AUSTIN, NURSE BRIGHT
All EMPLOYED AT 201 POPLAR Shelby County Jail

CONTINUE PAGE 2 IV. STATEMENT OF CLAIM PT. 2

WHILE I'M YELLING, "OPEN MY CELL! MY ARM IS IN THE DOOR!" NURSE BRIGHT AND OFFICER BOYLAND TOOK THEIR TIME LETTING SERGEANT BROWN KNOW. AFTER MAYBE A MINUTE MY CELL OPENED AND I GOT MY ARM OUT. SERGEANT BROWN THEN CAME TO MY CELL YELLING, "YOU STUPID MOTHER FUCKER I SHOULD OF LEFT YOUR ARM IN LONGER!" I STATED, "I NEED TO GO TO MEDICAL!" THEN SHE STATED, "I'M NOT SENDING YOU NO WHERE!" THIS WENT ON FOR 5 MINUTES THEN SHE YELLED, "TURN YOUR BLACK ASS AROUND SO I CAN CUFF YOU!" AFTER I WAS CUFFED SERGEANT BROWN TOLD TO PUT MY BACK ON THE WALL AND SHE AND OFFICER BOYLAND TOOK 10 MINUTES THROWING AWAY \$4,000.00 WORTH OF PRICELESS ITEM (CARDS THAT I MADE) INSTEAD OF TAKING ME TO MEDICAL. AT MEDICAL THE NURSE TREATED ME LIKE NOTHING HAPPENED AND WHEN I WAS SENT BACK TO MY CELL SERGEANT BROWN SAID I CAN'T HAVE RECREATION SO WHEN I SAID, "I WANT MY REC." SHE PULLED ME AWAY FROM THE SALLYPORT, PUSHED MY HEAD TO THE METAL GATE AND PUNCHED ME IN THE FACE THAT'S WHEN OFFICER BOYLAND GRABBED ME BY THE BACK OF MY SHIRT AND SLUNG ME TO THE FLOOR AND DRT CAME. I WAS HANDCUFFED BEHIND MY BACK. SERGEANT BROWN, OFFICER BOYLAND AND NURSE BRIGHT TREATED ME AWFUL CONCERNING THIS INCIDENT FOR NO REASON AND I SUFFERED GREATLY BEHIND IT BECAUSE I WAS HURT, IT WAS COVERED UP AND I LOST PRICELESS ITEMS.

~~PAIN~~ (STAFF MISCONDUCT, PAIN AND SUFFERING, MENTAL ANGUISH, MENTAL STRESS, GRIEF AND TURMOIL AND PRICELESS MATERIALS

2) ON MARCH 25TH 2023 6AM - 2PM SHIFT WHEN DRT WAS CALLED DRT GRAY STATED, "I'M GOING TO KILL YOU LIKE I DID 'G. FREEMAN'" (INMATE WHO JUST GOT KILLED IN FEBRUARY 2023 BY GRAY AND 10 OR MORE DRT'S)

DRT'S INVOLVED IN THIS INCIDENT: GRAY, HILSON, WILKINS, BAKER AND UNDERWOOD

I WAS TAKEN TO THE "CARDIAC ROOM" WHERE I WAS BRUTALLY BEATEN FOR 10 MINUTES BY DRT GRAY, WILKINS AND BAKER. I WAS STILL HANDCUFFED BEHIND MY BACK, I WAS PUNCHED, KICKED, HIT WITH PHONES IN MY FACE AND ENTIRE BODY. THEY EVEN TRIED KICKING ME IN MY PENIS. DRT GRAY YELLED, "I'M GOING TO GET YOU FOR WRITING A PRAISE ON ME. ALL THREE OF THEM BEGAN SAYING HOW THEY WERE GOING TO HAVE SEX WITH ME AND NOONE WILL KNOW."

THEN HILSON AND UNDERWOOD CAME IN SPRAYED ME WITH MACE IN MY MOUTH, PUNCHING ME IN MY FACE, HEAD, BACK AND KICKING ME IN MY FACE AND HEAD FOR 5 MINUTES. THE DOOR WAS CLOSED THE ENTIRE TIME.

THEN I WAS PUT IN ANOTHER ROOM "2-357" WHERE ALL 5 DRT'S BRUTALLY BEAT ME UP AGAIN FOR 5 MINUTES AND STOMPING ME ON THE FLOOR. DRT GRAY TOOK PHOTOS OF ONLY MY BRUISED UP FACE BUT NOT MY BODY.

I WAS TAKEN TO ~~4~~ 4-S-17 cell THEN 10 MINUTES LATER DRT HILSON (WHO HAD A 4FT BROKE BROOMSTICK SAID, "I'M GOING TO BREAK THE REST OFF IN YOUR ASS." WILKINS WAS WITH HIM.

I WAS TAKEN BACK TO THE "CARDIAC ROOM" WHERE I WAS RUSHED TO THE "E.R." ~~WHEN~~ WHEN I GOT BACK TO 201 JAIL MEDICAL STAFF SAID THERE WERE NO INJURIES.

I WENT TO MMHI ON APRIL 5TH IN WHICH I CONTINUED TO HAVE EYE PAIN SO MMHI DID X RAYS ETC. THAT'S WHEN I FOUND OUT I HAD A FRACTURED NOSE, FRACTURED RIGHT HAND AND THE SPECIAL LENS I HAVE IN MY EYE THAT HELPS ME SEE IS BENT AND CROOKED WHICH IS MAKING ME BLIND. 201 JAIL STAFF, MEDICAL STAFF COVERED UP THESE INJURIES.

BECAUSE OF THIS INCIDENT I AM IN FEAR OF BEING KILLED AND RAPED BY OFFICERS BECAUSE THERE IS NOONE TO PROTECT ME. THESE OFFICERS ARE DANGEROUS AND DOING WHATEVER THEY WANT. I AM TERRIFIED BY THESE OFFICERS. THESE OFFICERS HAVE MEDICAL STAFF ON THEIR SIDE COVERING UP SERIOUS INJURIES. I AM IN CONSTANT PAIN WITH MY EYE, HEAD, BACK, HAND, LEG ETC. IT'S HARD TO GET A GOOD NIGHT'S REST OR TRUST AN OFFICER ANYMORE.

CONTINUE PT. 4 IV. STATEMENT OF CLAIM

STAFF MISCONDUCT, SEXUAL HARASSMENT, PAIN AND SUFFERING, MENTAL STRESS, GRIEF AND TURMOIL, MENTAL ANGUISH, LACK OF MEDICAL TREATMENT, SLEEPLESS NIGHTS, EXCESSIVE FORCE

3) OFFICERS: JONES, HINNINGS, SERGENTS: MORNING, AUSTIN, Echds
NURSE: AUSTIN OFFICER HARRIS OFFICER JONES

I ASKED THE ABOVE OFFICERS AND SERGENTS TO GIVE ME A BOTTOM BUNK BECAUSE I HAVE A BOTTOM BUNK STATEMENT BUT THEY PUT ME IN A CELL GIVING ME A TOP BUNK.

ON MAY 4TH 2023 6am - 2pm TO 2pm - 10pm I WAS TRYING TO GET TO MY TOP BUNK BY USING THE TOILET AND SINK WHEN I HAD SLIPPED AND FELL, FALLING ON MY BACK AND HITTING THE BACK OF MY HEAD. EVERYONE WAS YELLING, "CODE WHITE" FOR SOMEONE TO COME

OFFICER HINNINGS LOOKED IN AND SAW ME ON THE FLOOR AND SAID, "IT'S NOTHING I CAN DO FOR YOU AND I'M NOT CALLING 'CODE WHITE'."

NURSE AUSTIN SAW ME ON THE CELL FLOOR AND SAID, "SMILE FOR ME NOW." AND STARTED LAUGHING.

SERGEANT MORNING NEVER CAME TO CHECK ON ME.

SERGEANT AUSTIN CAME TO MY CELL AND ARGUED WITH MY CELLMATE FOR 10 MINUTES THEN SAID, "I'M NOT CALLING NO 'CODE WHITE'!"

SERGEANT BUFORD SAID, "I'M NOT CALLING 'CODE WHITE'"

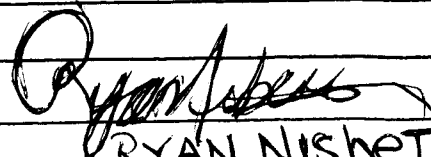
CONTINUE PT. 5 IV. STATEMENT OF CLAIM

OFFICER JONES LOOKED IN MULTIPLE TIMES AND AFTER 8 HOURS HE SAID, "YOU AND MORNING MUST HAVE PROBLEMS BECAUSE HE SAID NOT TO CALL YOU A "CODE WHITE!"

MAY 5TH 2023 WHICH WAS 24 HOURS LATER I WAS SENT TO MEDICAL AND GIVEN TYLENOL, MUSCLE RELAXER AND GATORADE AND SAID THAT I'M ON THE LIST TO SEE THE DOCTOR.

BECAUSE OF THIS INCIDENT I HAD TO BE TREATED AND SEEN 24 HOURS LATER WHICH CAUSED ME PAIN.

PAIN AND SUFFERING, LACK OF MEDICAL TREATMENT, MENTAL STRESS, MENTAL ANXIETY, GRIEF AND TURMOIL, STAFF MISCONDUCT



RYAN NISBETT

201 POPIAR AVE.

Memphis, Tenn. 38103

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments.

Cite no cases or statutes.

EXCESSIVE FORCE, STAFF MISCONDUCT, SEXUAL HARASSMENT,
PAIN AND SUFFERING, MENTAL STRESS, GRIEF AND TURMOIL,
LACK OF MEDICAL TREATMENT, MENTAL ANGUISH, SLEEPLESS NIGHTS
PRICELESS MATERIALS

TOTAL AMOUNT: \$10,000,000.00

TEN MILLION DOLLARS AND NO CENTS

I TRULY PRAY THAT NO ONE WILL EVER HAVE TO GO THROUGH
SOMETHING SO TERRIBLE AS THIS.

VI. Jury Demand

I would like to have my case tried by a jury. Yes ☒ No ☐.

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of our information, knowledge, and belief.

Signed this 15TH day of MAY, 2023.



(Signature of Plaintiff/Plaintiffs)